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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
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M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

JOINT STATUS REPORT

Assigned to: Hon. Edward M. Chen

Date: January 13, 2026

Time: 1:30 pm

Place: Zoom

Complaint filed: February 19, 2025

1 Additional Counsel for Plaintiffs

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The parties file this joint status report pursuant to the Court’s order of December 23, 2025, Dkt. 354, which granted Plaintiffs’ motion for leave to file a second supplemental complaint and ordered the parties to file a joint status report that “shall address, *inter alia*, the hearing in the *Miot* case on the § 705 motion to postpone in that case.”

I. Update on § 705 Hearing in *Miot v. Trump*, No. 1-25-cv-02471 (D.D.C.)

On January 6, 2026, the court in the *Miot* case held a hearing on plaintiffs’ § 705 motion to postpone Defendants’ November 28, 2025 termination of Haiti’s TPS designation. Per court order, the hearing will continue on January 7, 2026. *See* Minute Order, *Miot v. Trump*, No. 1-25-cv-02471 (Jan. 5, 2026). During the hearing, the *Miot* court stated that it intended to rule on Plaintiffs’ motion to postpone by February 2, 2026.

II. Other Updates Regarding Plaintiffs’ Second Supplemental Claims

On December 24, 2025, pursuant to this Court’s December 23 order, Plaintiffs filed their Second Supplemental Complaint. Dkt. 355. The Second Supplemental Complaint asserts APA and constitutional claims based on Defendants’ November 28, 2025 termination of Haiti’s TPS designation. On January 1, 2026, Defendants filed the Certified Administrative Record (CAR) for the November 28, 2025 Haiti termination. Dkt. 357. On January 2, 2026, pursuant to this Court’s order, the parties filed a joint status report concerning Plaintiffs’ request for extra-record discovery. Dkt. 358. On January 6, 2026, this court granted Plaintiffs’ request for extra-record discovery and ordered the parties to meet and confer to the extent there are disputes regarding date ranges or custodians. Dkt. 360.

III. Status of Plaintiffs’ Other Claims

On September 5, 2025, this Court granted summary judgment to Plaintiffs on their APA claims concerning Defendants’ vacatur and termination of Venezuela’s TPS designation and partial vacatur of Haiti’s TPS designation. Dkt. 279. This Court stayed the remainder of Plaintiffs’ claims. *Id.* The Supreme Court subsequently stayed this Court’s summary judgment order pending appeal. Defendants’ appeal to the Ninth Circuit of this Court’s summary judgment order is fully briefed, and set to be argued on January 14, 2026.

On December 10, 2025, this Court granted Plaintiffs’ motion for declaratory relief and

1 declared that the Venezuela vacatur and termination were unlawful. Dkt. 340. This Court stayed that
2 order for two weeks to allow Defendants to appeal. The stay expired on December 24, and, as of this
3 filing, Defendants have not appealed the declaratory judgment order.

4
5
6 Date: January 6, 2026

Respectfully submitted,

7 /s/ Jessica Karp Bansal

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20 *Attorneys for Plaintiffs*

21 Date: January 6, 2026

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Attorneys for Defendants

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have concurred in the filing of this document.

NATIONAL DAY LABORER ORGANIZING
NETWORK

/s/ Jessica Karp Bansal
Jessica Karp Bansal

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2026, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

NATIONAL DAY LABORER
ORGANIZING NETWORK

/s/ Jessica Karp Bansal

Jessica Karp Bansal